

**DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

JAMES M. McNAMARA,

Plaintiff,

v.

HESS CORPORATION, et al.,

Defendants.

CIVIL NO. 1:20-CV-60

JURY TRIAL DEMANDED

**NOTICE OF AGREED EXTENSION OF TIME**

PLEASE TAKE NOTICE that Defendants Hess Corporation (“Hess”) and Hess Oil New York Corp. (“HONYC”), through undersigned counsel, hereby give notice, pursuant to LRCi 6.1(b)(7), that Defendants and Plaintiff have agreed and stipulated to an extension of time to extend the briefing schedule on Plaintiff’s Motion to Remand (Doc. No. 99).

On August 27, 2020, Defendant Hess Corporation removed this matter from the Superior Court to the District Court of the Virgin Islands (Doc. No. 1). On December 7, 2021, Plaintiff filed a Motion to Remand and Memorandum in support thereof (Doc. Nos. 99 and 100).

Under LRCi 6.1(b)(5), Defendants’ Response would be due by December 21, 2021. However, due to novel issues of law and fact, coinciding with the rapidly approaching holidays, the parties have agreed to extend the Defendants’ deadline to file their response to Plaintiff’s Motion to Remand until January 4, 2022. In kind, the parties have agreed to extend the Plaintiff’s deadline to file his reply until January 21, 2022.

Respectfully submitted,

**Beckstedt & Kuczynski LLP**  
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DATED: December 17, 2021

By: s/ Carl A. Beckstedt III  
Carl A. Beckstedt III, Esq.  
VI Bar No. 684  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this December 17, 2021, I caused to be emailed the foregoing to all parties through their counsel of record.

s/ Tarsha Matthew  
Tarsha Matthew, Legal Assistant  
On Behalf of Carl A. Beckstedt III, Esq.